



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217/782-2113

CERTIFIED MAIL
7007 0220 0000 0153 6847

NOTICE OF INCOMPLETENESS

August 5, 2008

Wedron Silica Company
Attn: Mr. Ron Hollander
3450 East 2056th Road
Post Office Box 119
Wedron, Illinois 60557

| | |
|---------------------------------|-----------------------------------------------|
| <u>Application No.:</u> | 73031358 |
| <u>I.D. No.:</u> | 099804AAB |
| <u>Applicant's Designation:</u> | |
| <u>Received:</u> | July 14, 2008 |
| <u>Operation of:</u> | Sand/Aggregate Processing Plant |
| <u>Location:</u> | 3450 East 2056th Road, Wedron, LaSalle County |

The Illinois EPA has determined the above referenced construction and operating permit application to be incomplete pursuant to 35 Ill. Adm. Code 201.158 because data and information were not provided as required by 35 Ill. Adm. Code 201.152, 201.157, and 201.160, and 201.169.

Specifically, the following information must be supplied in order for the application to be considered complete:

1. Upon review of your application and information already on file with the Illinois EPA, it was determined that the potential to emit (PTE) for the hazardous air pollutant (HAP) Phenol and the potential to emit (PTE) for Particle Matter less than 10 microns (PM₁₀) exceed the major source criteria specified in Section 39.5.2 of the Illinois Environmental Protection Act (Act). Therefore, pursuant to 35 Ill. Adm. Code 201.169(a)(1), the application for Lifetime Operating permit cannot be issued. According to Section 39.5 of the Act, you must submit the Clean Air Act Permit Program (CAAPP) application. However, you may consider applying for a Federally Enforceable State Operating Permit (FESOP) instead, if actual emissions will be below major source thresholds.
2. A clear and thorough presentation, including detailed calculations, of the potential to emit (PTE) for the entire source including any proposed revisions, but not limited to, particle matter (PM), volatile organic materials (VOM) and hazardous air pollutants (HAP).
 - a. PTE shall be calculated based on the maximum potential usage of raw materials with the maximum allowable criteria pollutant content, at the maximum potential production rate, and year round (8,760 hours/year) operation of all processes and emission units at the source.

- b. Be specific in describing the maximum content (e.g., weight percent, pounds per gallon, pounds per ton, etc.) and name and type of criteria pollutant (e.g., VOM, HAP, PM, etc.) in each of the raw materials, wastes and products handled and/or generated at the source when presenting your calculations.
- c. Provide documentation and references for emission factors and other input data to the PTE calculations that support their use as representative of activities to be conducted at this source.
- d. Please note that PTE calculations can not include emission reductions associated with pollution control equipment (e.g., baghouse, filters, scrubbers, etc.) unless the use of pollution control equipment is specifically required by regulations applicable to the subject process/activity, or if emission reductions are required to a certain percentage in order to comply with an applicable emission rate limitation such as 35 Ill. Adm. Code 212.321 or 215.301. If you believe emission reductions due to controls are applicable for your PTE calculations, please clearly identify those reductions and justify them by referencing the applicable regulations/requirements.
- e. Please note that emissions from emission units claimed to be exempt from permitting pursuant to 35 Ill. Adm. Code 201.146 need to be identified and included in the PTE calculations.

The Illinois EPA welcomes and in fact encourages discussions, either in person or by telephone, with persons proposing projects which may be subject to the above regulations. Such discussions may explain and resolve issues much more effectively than written correspondence, to the benefit of both the Illinois EPA and an applicant. Please contact us if you believe such discussions would be helpful.

The Illinois EPA will be pleased to review a reapplication for this permit that includes the necessary information and documentation to correct the deficiencies noted above. In accordance with 35 Ill. Adm. Code 201.157, this reapplication may incorporate by reference the data and information submitted to the Illinois EPA in the original permit application, provided that you certify that the data and information previously submitted remains true, correct and current. The reapplication will be considered filed on the date it is received by the Illinois EPA and will constitute a new permit application for purposes of Section 39(a) of the Act. Two copies of this information must be submitted and should reference the application and I.D. numbers assigned above.

Page 3

If you have any questions on this, please call German Barria at 217/782-2113.

Edwin C. Bakowski
2/5/08

Edwin C. Bakowski, P.E.
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

2/5/2008

ECB:GB:jws

cc: Region 2
Ray Pilapil, CES